

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

BORIS WOODARD and SUSAN)	
WOODARD, as Surviving Parents of)	
ANNA WOODARD, deceased; and)	CIVIL ACTION FILE
BORIS WOODARD, individually,)	NO. 1:14-cv-03710-RWS
)	
Plaintiffs,)	
)	
v.)	
)	
THOMAS C. DEMPSEY,)	
)	
Defendant.)	

DEFENDANT'S MOTION TO EXCLUDE
OPINIONS OF PLAINTIFFS' IDENTIFIED ACCOUNTING EXPERT
JEAN-PASCAL GINGRAS

COMES NOW defendant Thomas C. Dempsey (“defendant”), by and through counsel, and, and respectfully moves the Court to exclude opinions of plaintiffs’ identified accounting expert, Jean-Pascal Gingras, pursuant to Federal Rule of Evidence 702 and the Supreme Court’s decision in Daubert v. Merrell Dow Pharm., Inc., 509 U.S. 579 (1993). In support of the instant motion, defendant relies on his memorandum of law in support, all materials attached to the instant motion, and the complete record in the above-styled case. For the reasons set forth in the accompanying memorandum of law, defendant respectfully requests that his motion be granted.

Respectfully submitted,

FREEMAN MATHIS & GARY, LLP

/s/ Abby A. Vineyard

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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically submitted the foregoing
DEFENDANT'S MOTION TO EXCLUDE OPINIONS OF PLAINTIFFS'
IDENTIFIED ACCOUNTING EXPERT JEAN-PASCAL GINGRAS to the
Clerk of Court using the CM/ECF system which will automatically send electronic
mail notification of such filing to counsel of record who are CM/ECF participants
and mailed by United States Postal Service, first-class, postage prepaid, a paper
copy of the same document to counsel of record who are non-CM/ECF
participants. Counsel of record is:

Michael L. Neff, Esq.
D. Dwayne Adams, Esq.
T. Shane Peagler, Esq.
Susan M. Cremer, Esq.

The Law Offices of Michael Lawson Neff, P.C.
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This 2nd day of December, 2015.

/s/ Abby A. Vineyard

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